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WOLVERINE WORLD WIDE, INC. • ROCKFORD, MICHIGAN 49351 • 616-866-5500 • TWX 170-333

March 25, 1997

VIA CERTIFIED MAIL/  
RETURN RECEIPT REQUESTED

Ms. Marsha Adams  
US EPA-Region V, SM-5J  
77 West Jackson Blvd.  
Chicago, IL 60604

Re: Butterworth #2 Landfill Superfund Site

Dear Ms. Adams:

This letter is written in response to your Request for Information (the "Request") concerning our company's alleged shipment of wastes for disposal at the Butterworth Landfill Site (the "Site"). We have reviewed the Affidavits attached to the Request in which unnamed persons allege that "tanning chemicals, empty barrels and sludge" were hauled from our facilities to the Site for disposal. Based on our investigation, we deny the allegations contained in those affidavits. In addition, we object to the fact that the identities of the affiants have been withheld, thus making it impossible to investigate the veracity or reliability of their statements.

With respect to your request that Wolverine World Wide, Inc. ("Wolverine") "reimburse the Agency for costs incurred to date and to voluntarily perform or finance the response activities that US EPA has determined or will determine are required at the Site," we must decline. To date, we believe there is insufficient evidence to conclude that Wolverine is liable for environmental response costs at the Site. Further, Wolverine does not have the financial resources to undertake and complete the remedy selected for this Site, even if such evidence existed. Therefore, Wolverine cannot agree to voluntarily reimburse the Agency's past costs, or voluntarily undertake the remedy selected by the Agency for the Site.

Subject to the objections provided above, and without admitting liability at the Site in any manner, Wolverine responds to your requests for information as follows:

- |   |          |   |
|---|----------|---|
| 1 | Request  | For each hazardous substance identified above, please give total volume, in gallons for liquids and in cubic meters for solids, for which you arranged for disposal and list when those substances were transported to the above referenced Site. |
|   | Response | Wolverine has no information which would suggest that wastes generated by Wolverine were transported to, and disposed of, at the Site. Therefore, Wolverine has no information responsive to this request.  |

2      Request              Provide copies of all records, including analytical results, shipping documents, and material safety data sheets, which indicated the identity, amounts, chemical composition and/or chemical character of the waste material (s) specifically, tanning chemicals, empty barrels and sludge that Wolverine disposed of at Butterworth #2 Landfill.

Response:              Please see our response to Request No. 1.

3.      Request:              Provide a schematic diagram that indicates which part of the Wolverine operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wasted resulting from the manufacture of the company's products.

Response              Wolverine has no information which would suggest that wastes generated by any of its operations were transported to, and disposed of at the Site. Nevertheless, attached as Exhibit A is a schematic diagram which identifies how raw materials are used, and waste products are generated by Wolverine in connection with its manufacturing operations. By providing this schematic diagram, Wolverine does not admit or acknowledge that waste products generated by its operations were disposed of at the Site.

4.      Request:              List the contents in the drums before they were emptied. Describe the chemical composition and chemical character of the contents.

Response:              Wolverine has no information that drums containing its wastes were ever sent to the Site. Therefore, Wolverine has no information concerning the identity, chemical composition, or chemical character of the contents of such drums.

5.      Request:              Describe where and by what process these materials contained in the above mentioned drums were disposed.

Response:              Wolverine has no information that drums containing its wastes were ever sent to the site. Therefore, Wolverine has no information concerning how the wastes allegedly contained in those drums were disposed.

The undersigned certifies that the information contained in the above responses is true and accurate to the best of his knowledge and belief, Furthermore, the undersigned certifies that all documents submitted by Wolverine in connection with the above responses are true and authentic to the best of his knowledge and belief.

Respectfully submitted,

**WOLVERINE WORLD WIDE, INC.**

By 

Its Mgr., Environmental Affairs

STATE OF MICHIGAN )  
 ) ss.  
COUNTY OF KENT )

The foregoing instrument was acknowledged before me this 27th day of March, 1997 by \_\_\_\_\_ as \_\_\_\_\_ of Wolverine World Wide, Inc., a Michigan corporation, on behalf of the corporation.

Sandra E Voss

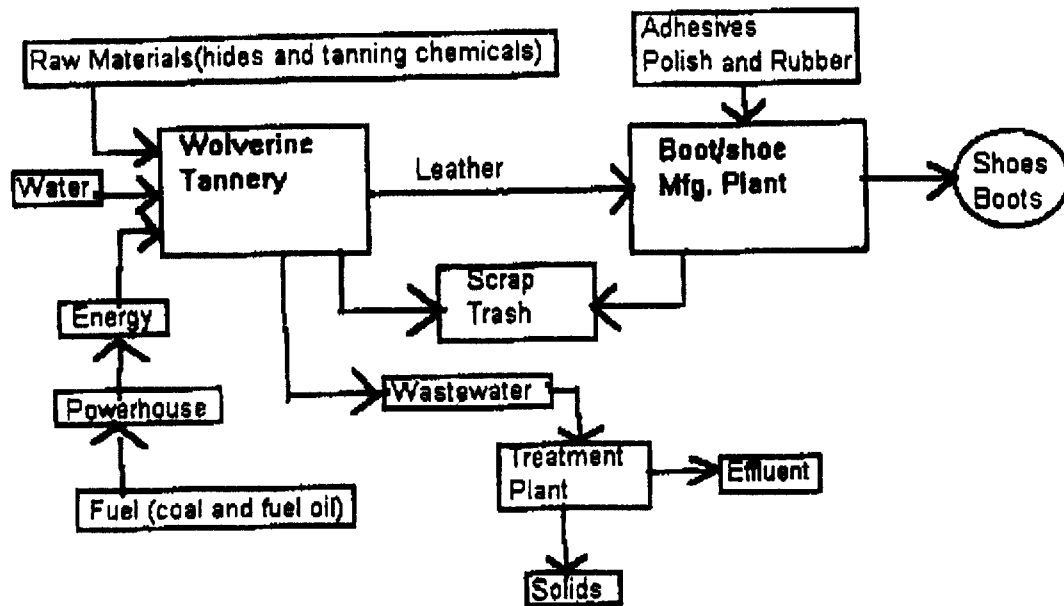
Notary Public, Kent County, MI

My commission expires: \_\_\_\_\_

**SANDRA E VOSS**

Notary Public, Kent County, MI

My Commission Expires Sept. 10, 2001

**EXHIBIT A**

**VOLVERINE**  
**WORLD WIDE**  
K FORD, MICHIGAN 49351

**CERTIFIED**

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**MAIL**

Ms. Marsha Adams  
US EPA-Region V, SM-5J  
77 West Jackson Blvd.  
Chicago, IL 60604

**RECEIVED**

SUPERVISOR  
MANAGEMENT

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